

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

Liberty Property Holdings SC, LLC <i>individually,</i>)	Case No.: 4:22-CV-03556-SAL PLAINTIFFS' IDENTIFICATION OF EXPERT WITNESSES
<i>derivatively on behalf of</i> Renaissance Tower)	
Horizontal Property Regime, <i>and on behalf of a</i>)	
<i>class of all others similarly situated;</i> Azure Bleu,)	
LLC; Edelyne Beauvais-Thomas; Jason E.)	
Blosser; Nicole M. Blosser; Eshellah D. Calhoun;)	
Zachary G. Calhoun; David DiMaio; Linda)	
DiMaio; Susan H. Ferguson; Four Parts Whole,)	
LLC; Sharon M. Hubbard; Carol A. Messenger;)	
Jeffrey S. Palmer; Summalin, Inc.; Terry J.)	
Tuminello; Shelley Ware; and Jonathan S.)	
Williams,)	
)	
Plaintiffs,)	
v.)	
)	
Jeffrey L. Richardson; William S. Spears; Brent)	
M. Whitesell; Laurie Z. Wunderley; Madeline R.)	
Mercer; Catherine M. Gregor; Dennis J. Sassa;)	
Tracy A. Meadows; Peter A. Grusauskas; and)	
Edward A. Wunderley, <i>in their capacities as former</i>)	
<i>and current co-owners and directors constituting</i>)	
<i>the Board for the Renaissance Towers Horizontal</i>)	
<i>Property Regime;</i> William Douglas Management,)	
Inc.; and, John Doe 1-10,)	
)	
Defendants,)	
)	
Renaissance Towner Horizontal Property)	
Regime,)	
)	
Nominal Defendant.)	

The Plaintiffs above-named, pursuant to Rule 26(a)(2), Fed. R. Civ. P., identify and disclose the following expert witnesses whom they may use at the trial of this matter:

A. Rhett Whitlock, PhD, P.E.
WDP & Associates
3139 First Avenue South
Murrells Inlet, South Carolina 29576
Tel. 800-755-0758

Jim Buxton, Esq.
Buxton & Collie, LLC
940 Johnnie Dodds Blvd
Suite 100
Mount Pleasant, SC 29464
Tel. 843-606-2397

Pledger M. Bishop III, MAI, SRA, AI-GRS
Valbridge Property Advisors
1250 Fairmont Avenue
Mount Pleasant, South Carolina 29464
Tel. 843-856-2000

Mr. Whitlock's testimony includes and/or will relate to his opinions regarding the structural deficiencies at the Renaissance Tower building as early as the year 2000 and the increased costs of repair on account of Defendants' delay in effecting those repairs. Mr. Buxton's testimony includes and/or will relate to his opinions regarding the failure of Defendants to abide by the duties and obligations owed to the Plaintiff homeowners. Mr. Bishop's testimony includes and/or will relate to his opinions regarding damages suffered by Plaintiffs relating to, *inter alia*, the loss of use of their property.

Copies of each of these experts' reports are being served upon Defendants contemporaneously with the filing of this expert disclosure. Plaintiffs reserve the right to serve amended and/or supplemental reports of their experts as appropriate.

[signatures on following page]

Respectfully submitted:

EPTING & RANNIK, LLC

This 9th day of December, 2024
Charleston, South Carolina

/s/Jaan Rannik
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